

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA**

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**CRIMINAL NUMBER 19-507-1**

**ROBERT BRENNAN**

**ORDER**

**AND NOW**, this                      day of                      , 2021, the Court being advised that defense counsel needs additional time to prepare for trial, and that the Government has no objection to the defendant's motion, the Court finds that the ends of justice to be served by granting a continuance in this matter outweigh the public's interest in a speedy trial, and therefore pursuant to Title 18, United States Code, § 3161(h)(7)(A), (B) and (C), it is hereby **ORDERED** that the defendant's unopposed motion for continuance of trial is **GRANTED**.

Trial in this matter shall begin on the                      day of                      , 2021.

**BY THE COURT:**

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**THE HONORABLE ANITA B. BRODY**  
Senior United States District Court Judge

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA**

**V.**

**ROBERT BRENNAN**

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**CRIMINAL NUMBER 19-507-1**

**DEFENDANT'S UNOPPOSED MOTION  
TO CONTINUE TRIAL AND RESET DEADLINES**

Robert Brennan, by his attorneys Catherine C. Henry, Senior Litigator and Katrina Young, Assistant Federal Defender, Federal Community Defender Office for the Eastern District of Pennsylvania, hereby request additional time for filing trial and to file trial documents. In support of this request, it is stated:

1. On September 5, 2019, Mr. Brennan was arraigned before The Honorable Lynne A. Sitarski and entered a plea of not guilty on all counts.

2. Trial in this matter is scheduled to commence on August 9, 2021. The deadline for filing motions *in limine* and trial documents is July 2, 2021.

3. Additional time is requested to do necessary investigations and legal research, meet with the defendant to continue reviewing discovery and preparing for trial, and continue to explore a non-trial disposition. A continuance of at least ninety (90) days from the current trial date is respectfully requested, and it is requested that the deadlines for filing motions *in limine* and trial documents be reset accordingly.

4. Under the Speedy Trial Rule, Title 18 U.S.C. §§ 3161(h)(7)(A), (B) and (C), the period of delay resulting from a continuance is excludable where granting the continuance serves

the ends of justice and outweighs the best interest of the public and the defendant in a speedy trial. Defense counsel agrees that all time until the next trial date would be excludable if the Court grants the instant motion.

5. Failure to grant this request for a continuance would result in a miscarriage of justice, 18 U.S.C. § 3161(h)(7)(B)(i).

6. Failure to grant the continuance would deny counsel for the defendant the reasonable time necessary for preparing effectively to represent this defendant in this matter.

7. Counsel has discussed this continuance with the defendant and he does not object to this request.

8. Assistant United States Attorney, Michelle L. Morgan does not oppose this request.

**WHEREFORE**, for the foregoing reasons, the defense respectfully requests that this motion be granted and the trial be continued for not less than ninety (90) days.

Respectfully submitted,

/s/ Catherine C. Henry  
CATHERINE C. HENRY  
Senior Litigator

/s/ Katrina Young  
KATRINA YOUNG  
Assistant Federal Defender

**CERTIFICATE OF SERVICE**

We Catherine C. Henry, Senior Litigator and Katrina Young, Assistant Federal Defender, Federal Community Defender Office for the Eastern District of Pennsylvania, hereby certify that we have caused a copy of Defendant's Unopposed Motion to Continue Trial and Reset Deadlines, to be filed and served electronically through the Eastern District's Clerk's Office Electronic Case Filing ("ECF") and/or by electronic mail upon:

Michelle L. Morgan  
Assistant United States Attorney  
United States Attorney's Office  
615 Chestnut Street, Suite 1250  
Philadelphia, Pennsylvania 19106.

/s/ Catherine C. Henry  
CATHERINE C. HENRY  
Senior Litigator

/s/ Katrina Young  
KATRINA YOUNG  
Assistant Federal Defender

DATE: June 17, 2021